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Alliance for Public Technology

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December 15, 1997

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DEC 15 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

William A. Caton
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Ex-parte CC Docket No. 97-208

Dear Secretary Caton:

On Wednesday, December 10, 1997, Maureen Lewis and Sylvia Rosenthal, representing the Alliance for Public Technology, Albert Clark, representing the United Homeowners Association, and Vanessa Thompson, representing the National Association of Commissioners for Women met with James Casserly of Commissioner Ness' staff to discuss BellSouth's application to offer long distance service in the state of South Carolina.

Attendees discussed the consumer benefits of competition in the long distance market, including lower rates, new incentives for investment in advanced infrastructure, and incentives for IXC's and CLECs to serve the local residential market.

The enclosed materials were left with Commissioner Ness' staff.

Thank you.

Sincerely,

Maureen Lewis
General Counsel

Enclosures

OH



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Education Policy Consultant

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The Markle Foundation*

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October 20, 1997

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OCT 21 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Reed Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: Comments of the Alliance for Public Technology
CC Docket No. 97-208

Dear Chairman Hundt:

In several proceedings, the Alliance for Public Technology (APT) has urged the Commission to adopt policies that would foster investment in and deployment of advanced infrastructures in the local network to enable every home to be able to receive and send, over a high bandwidth network, video, data and voice communications. We are motivated by the firm belief that these technologies can improve the quality of life for all sectors of our society, particularly the diverse range of nonprofit communities and individuals that APT serves.

A balanced policy that encourages both long distance and local competition can accelerate progress toward the goal APT has articulated. For example, local phone company entry into the long distance market can provide an incentive for infrastructure investment and innovative services. It can also spur a strong retail marketing effort, both in the long distance and the local markets.

This brings us to the pending application of BellSouth to enter the long distance market within its region. The Alliance is not in a position to judge the compliance of any one company with respect to the 14 point checklist of requirements. We do note that the South Carolina PUC has determined that BellSouth has fulfilled the requirements of the checklist. This determination


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by the regulators at the local level is obviously entitled to great weight. [See Section 271 (d) (2) (B) "Consultation With State Commissions."]

We would, therefore, urge that the Commission give the most serious consideration to the application of BellSouth, in order to obtain the competitive benefits as soon as possible.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dr. Barbara O'Connor".

Dr. Barbara O'Connor
Chair

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OCT 20 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of the)	
Application by BellSouth)	CC Docket No. 97-208
for Provision of)	
In-Region, Interlata)	
Services in South Carolina)	

COMMENTS OF
UNITED HOMEOWNERS ASSOCIATION

The United Homeowners Association (UHA) submits the following comments in the above referenced proceeding.

BellSouth has submitted an application to the Federal Communications Commission (FCC) to offer long distance service in South Carolina. BellSouth's application is the third such request for permission to enter the long distance market. The FCC has denied two applications submitted earlier by Ameritech and SBC.

UHA hopes that BellSouth's applications will meet the concerns of the Commission, and we think there is every reason that it should.

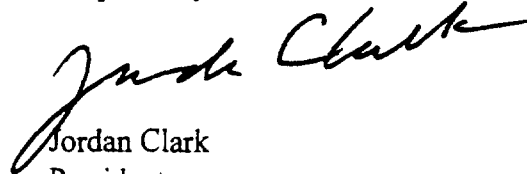
The South Carolina Public Service Commission unanimously agreed that BellSouth has met its obligations under the 1996 Telecommunications Act to open its market to competition (the 14 point checklist) and that allowing BellSouth to offer long distance service is in the public interest. UHA has also reviewed BellSouth's OSS system which allows competitors to purchase BellSouth service for resale and unbundled network elements for use with their own facilities. It is available today for competitors

throughout the BellSouth region. It can be accessed using the internet, through direct dial-up service, or by calling BellSouth service representatives.

The FCC can deliver, in part, the promise of the 1996 Act to homeowners in South Carolina by approving BellSouth's application. BellSouth has already announced that its basic rates for long distance service in South Carolina will be 5 percent less than basic rates offered by the leading long distance carriers. UHA believes that additional savings are possible. In Connecticut where SNET, a local telephone company, now offers long distance service under deregulation, rates have fallen even more dramatically.

The FCC will have 90 days from the date of filing to issue a decision on BellSouth's application. UHA urges the FCC to approve the application so that homeowners in South Carolina can realize the benefits of meaningful competition in the long distance market.

Respectfully submitted



Jordan Clark
President

United Homeowners Association
1511 K Street, NW, 3rd Floor
Washington, D.C. 20005
(202) 408-8842

October 20, 1997



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OCT 20 5 29 PM '97

OFFICE OF THE CHAIRMAN

OCT 21 '97

October 20, 1997

Honorable Reed Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

IN RE: BellSouth's Application To Offer Long-Distance
Service in South Carolina, CC Docket No. 97-208

Dear Chairman Hundt:

The NACW is writing to urge you to support approval of BellSouth's application to offer long-distance service in the state of South Carolina. The National Association of Commissions for Women (NACW) represents more than 270 state, county and local commissions nationwide including state and local commissions in the Southeast including South Carolina, North Carolina, Georgia, Alabama, Louisiana, Mississippi, Florida and Kentucky.

In a recent article from the October 20, 1997 issue of Business Week magazine, "McCain on the Record: Telecom Reform", U.S. Senator John McCain was asked his opinion of the MCI-WorldCom merger and he said, "The deal is another example of the failure of the telcom bill ... we made it easier for companies to merge rather than to compete with each other." The U.S. Senate Committee Chairman seems to believe that market consolidation, rather than competition hurts consumers; and, we agree particularly for those consumers spending less than \$25.00 per month in long-distance calling. They have in fact seen an increase in their monthly telephone bills since the implementation of the Telecommunications Act. Most low volume customers have not benefited from price competition because long-distance companies (MCI, Sprint and AT&T) advertising campaigns more than often target high-end residential customers which exclude the vast majority of consumers.

With the BST proposal to price its service at five (5) percent below the competition, this will enable consumers to realize immediate savings in long-distance calling minutes. It will not only mean lower rates, but better service for consumers by affording them the opportunity to "one stop" shop: receiving one bill from one company. Consumers would have a wider choice in selecting long-distance services which would have the concomitant effect of ushering in a new era of competition for the long distance industry.

The findings of an April 1997 study, "Women are Embracing Technology" conducted by Penn. Schoen and Berland, concluded that:

- Twenty-nine (29%) percent of women work at home. When they do, they're apt to rely on computers and fax machines;
- Professional women earning more than \$45,000 a year are three times more likely to be heavy computer users;
- Seventy-nine (79%) percent of women say you need to know how to use the latest tech gadgets; and
- Seventy-nine (79%) percent also say they use a computer at work and 63% log onto a PC daily.

Women are smart enough to make choices about the kinds of communication services we need. We make choices everyday in almost every aspect of our lives. The last thing we need is government regulations that limit our choices, and we certainly don't need government to mandate what price we pay for the goods and services we choose. And yet, this is the situation that exists today in the long-distance industry.

The time has come for this to change. I urge you to support BST's application to offer long distance service in South Carolina. All markets, including local and long-distance should be open to competition. It has been more than a year since the President signed the Communications Act into Public Law. The time has come to open up the long-distance market to competition in South Carolina.

The NACW promotes the interests of women in cultural, social and economic fields. NACW supports policies and programs that empower women to make informed choices about all aspects of our lives. NACW has been active in the debate on telecommunications reform, supporting legislative and regulatory initiatives to enhance competition, thereby creating new options and services for women as consumers and in their businesses.

Our homepage address is <http://www.nacw.org>.

Thank you for your time.

Sincerely,


Camille Murphy

Keep America Connected!

National Campaign for Affordable Telecommunications

P.O. Box 27911, Washington, DC 20005
202-842-4080; 202-408-1134 Fax

News Release

**For Immediate Release
September 24, 1997**

**For More Information Contact
Angela Ledford 202-842-4080**

Consumers Call on FCC to Investigate Illusive Savings From Access Charge Reductions

(WASHINGTON...September 24, 1997) Keep America Connected today called on Federal Communications Commission Chairman Reed Hundt to investigate how much of the \$1.7 billion access charge reduction the long distance industry pocketed and how much it passed on to consumers.

Keep America Connected based its request on strong evidence that many consumers are not saving money on their long distance bills despite cuts in access charges, and may even be paying more. In May, the FCC ordered cuts in access charges, the fees long distance companies pay local phone companies for connecting calls. The Commission predicted that the average consumer would save around \$2.00 per month.

"Consumers were promised lower phone bills, but few will see any real savings," said Angela Ledford, Director of Keep America Connected. "Only two companies made any attempt to pass through the savings, others pocketed the savings and even increased their fees."

Keep America Connected's report, "In Search of Savings," shows that long distance companies employed a wide variety of strategies to hold on to the access charge reductions. Companies lengthened daytime calling periods, (the most expensive rates of the day), increased calling card rates and charges and raised the price of directory assistance. With the exception of consumers paying AT&T and MCI's most expensive rates, few others saw any immediate, per-minute savings.

During the access charge proceedings, Keep America Connected and several other consumer organizations appealed to the FCC to require that the long distance companies pass through the access reductions. The results of Keep America Connected's study indicate that, absent a mandate, only greater competition in the long distance market will bring real savings.

"The FCC must open the long distance market to greater competition," Ledford said. "Only a large competitor can bring the kind of competition necessary to force long distance rates down. The entry of the local phone companies would have a dramatic impact on an industry that has been steadily raising rates for the last eight years."

Keep America Connected is a coalition of organizations representing older Americans, people with disabilities, rural and inner city residents, labor and local phone companies.

For a copy of the letter and/or the report, call 202-842-4080

Keep America Connected!

National Campaign for Affordable Telecommunications

PO Box 27911, Washington, DC 20005

202-842-4080; 202-408-1134 Fax

September 24, 1997

Chairman Reed Hundt
Federal Communications Commission
1919 M Street MW
Washington, D.C. 20554

Dear Chairman Hundt,

After a thorough analysis of long distance rates since the July 1, 1997 access charge reduction, we have become very concerned that the long distance industry is not passing those savings along to consumers in the manner that was intended by the Commission. In fact, our analysis indicates that many consumers may see their long distance bills go up.

We are concerned about some far-reaching trends we see in the industry. Only two companies appear to have passed through any of the access charge reductions. Sprint and many other long distance companies made no attempt to pass along the savings. In addition, several companies increased calling card rates and discontinued some of their lowest cost plans. MCI cut its basic rates, but has made many changes that will increase costs to consumers, including higher long distance directory assistance charges and a longer daytime calling period.

Our analysis revealed that:

- Sprint standard rate customers' phone bills likely went up by as much as \$2.11/month. Bills for Matrix, LCI and WorldCom customers on basic rates stayed the same or went up by as much as \$1.45.
- Customers who have subscribed to the heavily marketed flat rate "discount" plans did not, by and large, benefit from the FCC's access charge decision.
- Rates for many carriers' cheapest plans are more expensive now than before access reductions were made.

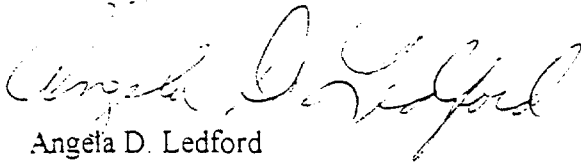
- By phasing out some discount plans and aggressively promoting others, the long distance carriers may be making up any amount of access savings they passed along to customers.
- Long distance carriers are raising the costs of long distance by extending daytime calling periods, raising fees on calling cards, and charging more for directory assistance.

We believe these findings are particularly important in light of the fact that long distance companies should see access charges go down by \$18 billion over the next five years. In the past, long distance companies have pocketed much of these savings. The effect of this highly publicized first round of rate reductions could indicate the savings consumers can expect in the future are illusory.

We respectfully request your investigation of the pass through of access charges to consumers. We hope you will look at which companies have passed through the savings, what was the aggregate amount of the pass through, and the amount of the pass through offset by fee increases and other revenue raising devices. We enclose a copy of our report for your review.

We appreciate your attention to this matter and look forward to the opportunity to discuss our concerns with you.

Sincerely,



Angela D. Ledford
Director

cc Commissioner James Quello
Commissioner Susan Ness
Commissioner Rachelle Chong
Members, Senate Commerce Committee
Members, House Commerce Committee

Keep America Connected!
***A National Campaign for Affordable
Telecommunications***

Presents

In Search Of Savings:

**A Look at Long Distance Phone Bills
After Access Reform**

September 24, 1997

Executive Summary

Keep America Connected sought to determine whether residential customers will save money as a result of the FCC decision to lower access charges by \$1.7 billion. Unfortunately, our analysis shows that the long distance industry, by and large, has used a variety of devices to hold on to the money, instead of passing the full amount of savings along to their customers.

Access charges are the fees that long distance companies pay to the local phone company to start and complete a call. Long distance companies argued that these fees kept long distance rates higher than necessary and implied (and, some cases, promised) they would pass along any reduction in these fees to consumers. Keep America Connected worked to keep these fees contributing to quality, low-cost local service -- and to make sure consumers received the benefit of any savings reduction in access charges. The FCC failed to enact Keep America Connected's recommendation and here's what happened.

Summary of Findings

- FCC Chairman Reed Hundt claimed that the "typical" or average residential customer's bill would drop from \$22.50 a month to \$20.65 a month. Keep America Connected's analysis of long distance company rates and found that rates for the FCC's typical caller were just as likely to go up as down.
- Only two of the nation's long distance companies reduced the cost of their "standard" (most expensive) rates.
- Sprint standard rate customers' phone bills likely went up by as much as \$2.11/month. Matrix, LCI and WorldCom customers on basic rates stayed the same or went up by as much as \$1.45.
- Customers who have subscribed to the heavily marketed flat rate "discount" plans did not benefit much from the FCC's access charge decision.
- Rates for many carriers' cheapest plans are more expensive now than before access reductions were made.
- By phasing out some discount plans and aggressively promoting others, the long distance carriers may be making up any amount of access savings they passed along to customers.
- Long distance carriers are raising the costs of long distance by extending daytime calling periods, raising fees on calling cards, and charging more for directory assistance.

Introduction

In May, amid great fanfare, the Federal Communications Commission (FCC) announced new rules for universal service and long distance access charges. After months of struggling through the competing claims and demands of the local phone companies, long distance companies, consumer groups, and a wide array of other interest groups, the Commission proudly proclaimed that it had established the rules necessary to implement the 1996 Telecommunications Act and that consumers would save money as a result.

The consumer savings heralded by the FCC were largely the result of reductions in access charges, the fees long distance companies pay local telephone companies to connect long distance calls. Access charges were reduced by \$1.7 billion on July 1, 1997. Since 1991, the major long distance companies, AT&T, MCI, and Sprint, have increased rates in lockstep, notwithstanding the fact that access charges were decreasing (see Chart 1).

In a major departure from past practices, AT&T promised to lower long distance rates.¹ MCI ultimately followed suit.² AT&T and MCI reduced their basic or standard rates by 5 percent during the daytime, 5 percent in the evening, and 15 percent at night and on weekends. The nation's third largest long distance company, Sprint, made no such commitment and, to date, has not reduced basic rates to reflect the access charge reductions ordered by the FCC.

FCC Chairman Reed Hundt claimed that the "typical," or average, residential customer would save more than 8 percent on long distance as a result of the Commission's action. According to the FCC the average customer's long distance bill would drop from \$22.50 a month to \$20.65 a month.

Average Customer Savings

Keep America Connected³ set out to find out what happened to the "typical" residential long distance customer as described by Chairman Hundt. He/she was hard to find.

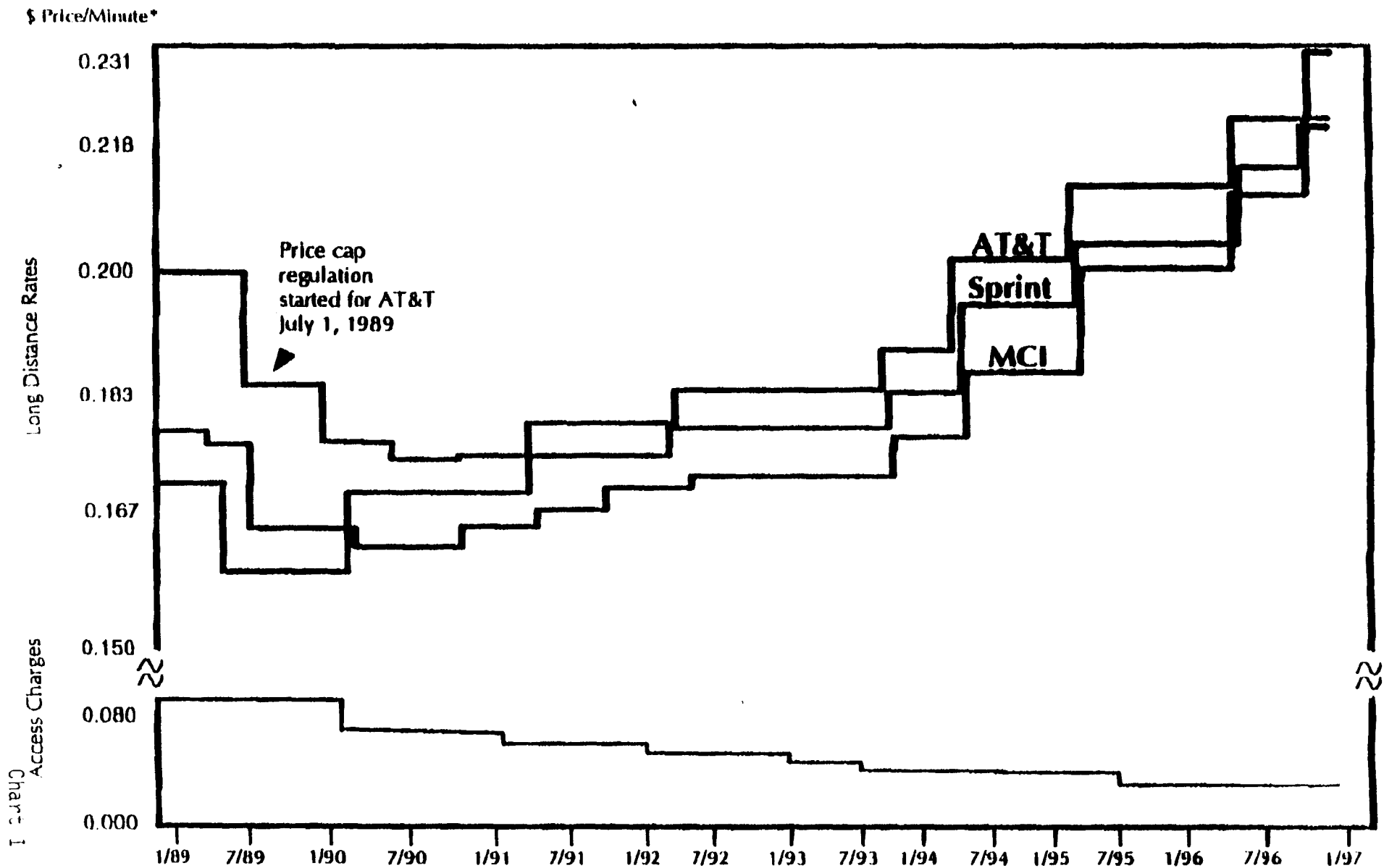
Long distance prices are very complicated. Rates vary from company to company and from calling plan to calling plan. The most thorough analysis of long distance prices is prepared

¹ "AT&T Reaction to FCC Plan to Reform Access Fees, Universal Service," AT&T press release, May 7, 1997.

² "FCC Decision Takes First Step Towards Lowering Excessive Access Charges," MCI statement, May 7, 1997

³ Keep America Connected is a coalition of organizations representing older Americans, people with disabilities, rural and inner city residents, people of color, lower income citizens, labor and local phone companies. The campaign's agenda is to ensure accessible telecommunications for daily life and to enact policies that lead to a modern information infrastructure available to all people.

Trends in Long Distance Rates and Exchange Access Charges



*Long distance rates based on the average price per minute for basic service.

Source: WEFA Group and FCC Tariff Filings

regularly by the Telecommunications Research and Action Center (TRAC).⁴ Four times a year, TRAC updates its residential and small business long distance price comparisons that track the significant and subtle changes in long distance rates and services of the nation's leading long distance carriers.

TRAC compares the costs for 18 different long distance calling patterns or baskets⁵ for 35 different calling plans⁶ offered by seven of the largest long distance companies.⁷ The calling baskets go beyond simple calculations of per minute rates. The baskets include a representative sampling of directory assistance and calling card calls to more realistically represent a consumer's bill at the end of the month.

Keep America Connected obtained copies of TRAC's March 1997 and September 1997 residential charts to see just what happened to the FCC's "typical" customer. Of the 631 analyses done by TRAC in March, 46 were in the range of \$20.00 to \$25.00 per month, approximating the FCC's typical customers.⁸ We were able to make 30 identical comparisons with TRAC's September 1997 chart.⁹ In 9 cases the cost of monthly long distance went up, in 10 cases it stayed the same, and in only 11 cases did the cost of long distance actually go down. [See Table 1]

As you can see, the result is a mixed bag for TRAC's average or typical residential customer. Savings ranged from 42 cents to \$3.03. Potential increases in the typical callers' phone bill ranged from a penny to \$2.11.

Standard Rate Customers

So, who are the residential customers who will reap the benefits of the FCC's new access charge rules? They are, by and large, some, but not all, standard rate customers.

In a report issued earlier this year, the United Homeowners Association (UHA) estimates that approximately 60 percent of long distance residential customers are paying basic rates.¹⁰

⁴ TRAC is a non-profit, tax exempt, membership organization based in Washington, DC. Its goal is to promote the interests of residential telecommunications customers. Twice a year, TRAC's staff researches residential long distance rates and publishes their findings in Tele-Tips™.

⁵ A calling basket represents a hypothetical calling pattern containing a set amount of minutes per month.

⁶ A calling plan is a program offered by a long distance carrier providing specific rates and services.

⁷ AT&T, MCI, Sprint, Frontier, LCI, Matrix, and WorldCom.

⁸ FCC's typical consumer was represented in TRAC's 12 - 18-call call baskets, totalling from 106 to 179 minutes of calling.

⁹ Some plans were no longer offered by the carriers, and some were taken off at the request of the carrier.

¹⁰ "Charging for Residential Long Distance Service: Who is Paying Too Much," Prepared for the United Homeowners Association by Dwight R. Lee, Ramsey Professor of Economics and Private Enterprise, University of Georgia, Athens Georgia.

COMPARISON OF AVERAGE MONTHLY HOUSEHOLD BILLS MARCH 1997 - SEPTEMBER 1997

Keep America Connected obtained copies of TRAC's March 1997 and September 1997 residential charts to see just what happened to the FCC's "typical" customer. Of the 631 analyses done by TRAC in March, 46 were in the range of \$20.00 to \$25.00 per month (12-13 calls per month or about 86-179 minutes), approximating the FCC's typical customer. We were able to make 33 identical comparisons with TRAC's September 1997 chart. In 13 cases the monthly cost of long distance service went down, in 16 cases it stayed the same, and in 9 cases it

Standard Rate Plans	Average Daily Use			Heavy Daily Use			Heavy Night/Weekend Use		
	March	Sept.	Diff	March	Sept.	Diff	March	Sept.	Diff
AT&T Dial-1 Standard				\$24.12	\$23.14	-\$0.98	\$24.58	\$21.55	-\$3.03
Frontier Dial-1				\$24.31	\$24.31	0	\$23.59	\$23.60	+\$0.01
LCI Basic	\$24.87	\$24.87	0	\$23.18	\$23.18	0	\$23.34	\$23.34	0
Matrix Dial-1	\$20.58	\$21.08	+\$0.50						
MCI Dial-1 Standard				\$23.99	\$23.57	-\$0.42	\$24.45	\$22.34	-\$2.11
Sprint Standard				\$24.12	\$24.91	+\$0.79	\$24.58	\$23.49	-\$1.09
WorldCom MTS	\$21.29	\$22.44	+\$1.15				\$22.64	\$21.03	-\$1.61

Flat Rate Plans with Multiple Time Periods

AT&T Simple Rate									
Frontier HomeSaver									
LCI All America Plan				\$24.96	\$24.96	0			
LCI Two Rate							\$24.66	\$24.66	0
Matrix SmartWorld							\$23.94	\$23.94	0
Sprint Sense									
WorldCom Home Advantage	\$24.70	\$26.40	+\$1.70						

Flat Rate Plans with a Single Time Period

AT&T One Rate							\$21.20	\$21.20	0
AT&T One Rate Plus				\$24.65	\$24.65	0	\$20.10	\$20.10	0
LCI Single Rate				\$23.51	\$23.51	0	\$20.26	\$20.26	0
Matrix Flat Rate I				\$22.44	\$22.44	0			
MCI One (after July 15, 1997)				\$24.93	\$24.93	0	\$20.68	\$17.23	-\$3.45
MCI One (before July 15, 1997)									
Sprint Sense Day				\$24.30	\$26.05	+\$1.75	\$20.60	\$21.35	+\$0.75
WorldCom Home Advantage Easy Plan									

Discount Plans Based On Consumer Calling Patterns

AT&T True Reach				\$21.71	\$22.06	+\$0.35	\$22.12	\$20.78	-\$1.34
AT&T True Savings									
Matrix SmartWorld Basic									
MCI Friends and Family	\$24.03	\$22.56	-\$1.47	\$22.65	\$21.43	-\$1.22			
MCI Friends and Family Free									
Sprint Sense with the Most									
Sprint The Most II				\$24.12	\$24.91	+\$0.79	\$24.58	\$23.49	-\$1.09

Term Commitment Plans

Matrix SmartWorld Basic w/Discount									
MCI One w/Cash Back (after July 15, 1997)									
MCI One w/Cash Back (before July 15, 1997)*									
Sprint Sense w/Cash Back							\$22.41	\$25.02	+\$2.61

Loyalty/Rewards Plans

AT&T One Rate w/True Rewards				\$21.71	\$22.06	+\$0.35	\$21.20	\$21.20	0
AT&T True Reach w/True Rewards							\$22.12	\$20.78	-\$1.34
AT&T True Savings w/True Rewards									

These are the most expensive rates a customer can pay. Consumers often end up on these plans when they establish local service and are asked to designate a long distance carrier. The consumer may not know about different discount plans and the local phone company only asks them to designate a company, not a plan. Unless the consumer actively requests a discount plan or their long distance company assigns them to a calling plan, they will pay the highest rates allowed.

The July cut in basic rates implemented by AT&T and MCI translated into real savings for many, but not all residential customers on standard calling plans. AT&T and MCI standard rate customers spending less than \$25 a month on long distance saw a reduction in their bills that ranged from \$.42 to \$3.03, a 1.75% to 12.33% decrease.

But Sprint standard rate customers' phone bills most likely went up by \$.79 to \$2.11. Matrix, LCI and WorldCom customers on basic rates stayed the same or went up by as little as a penny or as much as \$1.45. (See Table 2.)

The increases were caused not by an increase in the per minute rate, but by other, more subtle changes in the costs of long distance calling. Sprint extended its daytime calling period for basic rates from 8:00 AM to 5:00 PM to 7:00 AM to 7:00 PM, collecting their largest per minute rate for an additional three hours every day. MCI quickly followed suit. Day time rates are the most expensive. As a result, some Sprint customers on the company's standard rate plan will pay more for long distance service.¹¹

Other increases for long distance services included:

- MCI and WorldCom raised their long distance directory assistance charges; MCI's LDDA went up 20 cents while WorldCom's went up 19 cents.
- Sprint raised the cost of using a phone card. Sprint's surcharge for using the card went from 30 cents to 60 cents on every call made -- a 100 percent increase from the \$0.30 charge reported in TRAC's March 1997 chart.

Calling Plan Customers

Keep America Connected's analysis reveals that residential customers on discount calling plans probably have not seen any benefit from access charge reductions.

Residential customers on the heavily marketed flat rate calling plans will not save much as a result of the FCC's decision. Flat rate plans generally stayed the same. According to spokesman Paul Reiser, residential customers on AT&T's One Rate plan are still paying \$0.15 per minute of long distance service. And Candace Bergen reminds us that Sprint Sense customers are still paying \$0.25 per minute for peak and a dime a minute for off-peak calling.

¹¹ Also Sprint customers on discount plans based on standard rates will pay more.

COMPARISON OF AVERAGE MONTHLY HOUSEHOLD BILLS FOR STANDARD RATES MARCH 1997 - SEPTEMBER 1997

The July cut in basic rates implemented by AT&T and MCI translates into real savings for many, but not all, residential customers on standard calling plans. AT&T and MCI standard rate customers spending less than \$25 a month (12 calls or 86-121 minutes) on long distance saw a reduction in their bills that ranged from \$0.42 to \$3.03, a 1.75% to 12.33% decrease. But Sprint standard rates customers' phone bills most likely went up by \$0.79 to \$2.11. Matrix, LCI, and WorldCom customers on basic rates stayed the same or went up by as little as a penny or as much as \$1.45.

Average Daily Use (12 Calls / 106 Minutes)

	March	Sept.	Diff.	%
AT&T Dial-1 Standard	\$25.59	\$24.25	- \$1.34	-5.24%
Frontier Dial-1	\$27.18	\$27.18	+ \$0.00	0.00%
LCI Basic	\$24.87	\$24.87	+ \$0.00	0.00%
Matrix Dial-1	\$20.58	\$21.08	+ \$0.50	2.43%
MCI Dial-1 Standard	\$25.46	\$24.78	- \$0.68	-2.67%
Sprint Standard	\$25.59	\$27.70	+ \$2.11	8.25%
WorldCom MTS	\$21.29	\$22.44	+ \$1.15	5.40%

Heavy Daily Use (12 Calls / 86 Minutes)

	March	Sept.	Diff.	%
AT&T Dial-1 Standard	\$24.12	\$23.14	- \$0.98	-4.06%
Frontier Dial-1	\$24.31	\$24.31	+ \$0.00	0.00%
LCI Basic	\$23.18	\$23.18	+ \$0.00	0.00%
Matrix Dial-1	\$19.08	\$19.48	+ \$0.40	2.10%
MCI Dial-1 Standard	\$23.99	\$23.57	- \$0.42	-1.75%
Sprint Standard	\$24.12	\$24.91	+ \$0.79	3.28%
WorldCom MTS	\$18.77	\$20.22	+ \$1.45	7.73%

Heavy Night/Weekend Use (12 Calls / 121 Minutes)

	March	Sept.	Diff.	%
AT&T Dial-1 Standard	\$24.58	\$21.55	- \$3.03	-12.33%
Frontier Dial-1	\$23.59	\$23.60	+ \$0.01	0.04%
LCI Basic	\$23.34	\$23.34	+ \$0.00	0.00%
Matrix Dial-1	\$19.89	\$20.53	+ \$0.64	3.22%
MCI Dial-1 Standard	\$24.45	\$22.34	- \$2.11	-8.63%
Sprint Standard	\$24.58	\$23.49	- \$1.09	-4.43%
WorldCom MTS	\$22.64	\$21.03	- \$1.61	-7.11%

Several companies made changes to their calling plans that could mean higher rates. AT&T no longer promotes Simple Rate -- their \$0.25 per minute peak/\$0.10 per minute off-peak plan. MCI no longer offers Friends and Family Free, which gave customers who spent \$10 or more per month up to one hour of free calls to other MCI customers. But the company added a new plan based on its MCI One -- MCI One with Cash Back.¹² Sprint no longer offers Sprint Sense with Most Enhancement and Sprint Sense with the Most with Cash Back.

In addition, consumers are paying more for other long distance services. MCI, for example, raised their long distance directory assistance charges 20 cents, from \$0.95 per call to \$1.15 per call, a 15.8 percent increase. Consumers using Sprint's FONCARD will now pay a \$0.60 surcharge on every call made -- a 100 percent increase from the \$0.30 charge reported in TRAC's March 1997 chart. LCI raised its calling card off-peak rate from \$0.18 per minute to \$0.20 per minute. And WorldCom raised its long distance directory assistance charge from \$0.64 to \$0.85.

To make some sense out of what all these changes mean to residential customers, Keep America Connected looked, again, at the long distance analyses done by TRAC.

For nine of TRAC's 18 calling baskets¹³ with prices ranging from \$15 to \$40 per month, Keep America Connected compared each carrier's the best plan in March 1997 and September 1997. The results of that analysis is presented in Table 3. Of the 63 cases examined, in 21 cases the rate for the carrier's cheapest plan went up, in 25 cases it stayed the same, and in 17 cases it decreased. The lowest price calling plan for consumers spending less than \$40 a month went up 33% of the time, stayed the same 39% of the time and went down 26% of the time.

For example, for customers who make 18 long distance calls a month, (totalling 179 minutes), mostly at night or on the weekends, the best AT&T plan in March 1997 was Simple Rate, costing \$25.85. In September, the best AT&T plan was True Reach, costing \$28.58 per month, a 10 percent increase. The best MCI plan for the same customers in March 1997 was MCI Friends and Family Free, costing \$26.71. In September, the best MCI plan was MCI One with Cash Back, costing \$24.34, a nine percent decrease.

¹² MCI One is a flat rate calling plan that allows consumers to choose a "cash back" option. After a period of a year, the customer receives a check for the amount of 20% of the year's charges. The option is no longer available.

¹³ Looking at the calling baskets with prices ranging from \$15 to \$40 includes the FCC's typical customer and provides a larger sampling of data.

COMPARISON OF LOWEST COST CALLING PLAN MARCH 1997 - SEPTEMBER 1997

Average Daily Use

12 Calls / 106 Minutes

	March	Sept.	Diff.	%
AT&T	\$18.30	\$19.57	+\$1.27	7%
MCI	\$17.93	\$13.75	-\$4.18	-23%
Sprint	\$18.85	\$19.85	+\$1.00	5%
Frontier	\$16.95	\$16.95	+\$0.00	0%
LCI	\$17.88	\$17.88	+\$0.00	0%
Matrix	\$16.12	\$16.48	+\$0.36	2%
WorldCom	\$17.00	\$17.27	+\$0.27	2%

18 Calls / 159 Minutes

	March	Sept.	Diff.	%
AT&T	\$29.20	\$27.65	-\$1.55	-5%
MCI	\$28.08	\$21.65	-\$6.43	-23%
Sprint	\$25.34	\$27.72	+\$2.38	9%
Frontier	\$25.43	\$25.40	-\$0.03	0%
LCI	\$27.27	\$27.27	+\$0.00	0%
Matrix	\$25.48	\$25.48	+\$0.00	0%
WorldCom	\$24.70	\$26.38	+\$1.68	7%

Heavy Daily Use

12 Calls / 86 Minutes

	March	Sept.	Diff.	%
AT&T	\$16.70	\$16.70	+\$0.00	0%
MCI	\$15.93	\$12.04	-\$3.89	-24%
Sprint	\$15.85	\$16.85	+\$1.00	6%
Frontier	\$18.25	\$18.25	+\$0.00	0%
LCI	\$14.98	\$14.98	+\$0.00	0%
Matrix	\$14.71	\$14.71	+\$0.00	0%
WorldCom	\$18.60	\$14.49	-\$4.11	-22%

18 Calls / 129 Minutes

	March	Sept.	Diff.	%
AT&T	\$24.65	\$24.65	+\$0.00	0%
MCI	\$24.93	\$18.77	-\$6.16	-25%
Sprint	\$24.30	\$26.05	+\$1.75	7%
Frontier	\$27.35	\$27.35	+\$0.00	0%
LCI	\$23.51	\$23.51	+\$0.00	0%
Matrix	\$22.44	\$22.44	+\$0.00	0%
WorldCom	\$27.10	\$22.21	-\$4.89	-18%

Heavy Night and Weekend Use

12 Calls / 121 Minutes

	March	Sept.	Diff.	%
AT&T	\$15.45	\$20.10	+\$4.65	30%
MCI	\$16.80	\$14.42	-\$2.38	-14%
Sprint	\$14.55	\$15.30	+\$0.75	5%
Frontier	\$14.43	\$14.43	+\$0.00	0%
LCI	\$14.43	\$14.43	+\$0.00	0%
Matrix	\$14.69	\$14.69	+\$0.00	0%
WorldCom	\$14.69	\$14.75	+\$0.06	0%

18 Calls / 179 Minutes

	March	Sept.	Diff.	%
AT&T	\$25.95	\$28.58	+\$2.63	10%
MCI	\$26.71	\$24.34	-\$2.37	-9%
Sprint	\$22.41	\$25.02	+\$2.61	12%
Frontier	\$25.66	\$25.65	-\$0.01	0%
LCI	\$24.66	\$24.66	+\$0.00	0%
Matrix	\$23.94	\$23.94	+\$0.00	0%
WorldCom	\$26.58	\$26.70	+\$0.12	0%

Overall, MCI customers seeking the least cost plan fare far better than AT&T and Sprint customers. Of the nine cases examined for each company, the price for MCI's lowest cost plan decreased in each case. For AT&T, the price for the lowest cost plan increased four times, decreased only once, and stayed the same four times. In all nine cases the cost for Sprint's lowest cost plan increased.

The best strategy for the consumer who wishes to see any savings from access charge reform is to shop around. Only AT&T and MCI basic rate customers saw any immediate per minute rate reductions. For other consumers to see any benefit from access reform, they must be aware of changes in calling plans and request a change of plans and maybe a change in carrier. Sprint and MCI announced new promotions in the last week that could provide savings to consumers with very specific calling patterns (heavy Sunday or Monday evening callers). But consumers must keep a careful watch on their total monthly bill to see if they are getting real rate reductions.

Conclusions

After a thorough analysis of long distance rates since the July 1, 1997 access charge reduction, there is reason to be concerned that the long distance industry is not passing those savings along to consumers in the manner that was intended by the Federal Communications Commission. In fact, our analysis indicates that many consumers may see their long distance bills go up.

The Federal Communications Commission should launch an investigation of the carriers' handling of the access charge reduction and their willingness to pass through access charges to consumers. It should look at which companies, if any, passed all the savings on to consumers, what was the aggregate amount of the pass through, and how much was it offset by fee increases and other revenue raising devices.

It is important that these questions be answered in light of the fact that long distance companies should see access charges drop by go down by \$18 billion over the next five years. In the past, long distance companies have pocketed much of these savings. If the effect of this highly publicized first round of rate reductions indicates what consumers can expect from future access charge reductions, the FCC needs to take steps to ensure real rate reductions take place.

Ultimately, only increased competition will push these carriers to pass along these savings. The FCC should move quickly to break the big three long distance carriers' dominance in the long distance market. Allowing local phone companies to provide long distance service will create more competition in the long distance market and force rates down.

Keep America Connected!

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Residential Consumers Put on Hold by Long Distance Companies.

Large and Small Companies Rush to Compete for Business Customers But They Won't Be Coming Soon to Your Neighborhood.

(WASHINGTON, DC...October 17, 1997) Large and small long distance companies show little or no interest in serving residential customers in the Southeastern United States according to a preliminary study released today by Keep America Connected. Early results of the study show that while business consumers are realizing the benefits of competition, the prospects of residential consumers seeing lower prices and greater choices are slim.

When consumers called to request service from the companies that are authorized to provide local residential telephone service in Florida, South Carolina and Louisiana, they were discouraged or refused service out-right. Consumers found it very difficult to get a definitive answer out of many of the new competitors. But it is clear that none of the carriers are clamoring for residential business.

"Consumers in all neighborhoods and in all walks of life stand to benefit from the telephone competition we have been promised," said Keep America Connected Director Angela Ledford. "But where is it? If competition for telecommunications services extends to large businesses only, residential customers and small businesses will be left out of the information age."

While consumers are being deprived of choices in local service, their long distance rates continue to be higher than necessary due to the lack of competition in the long distance

-more-

And the long distance companies are using their refusal to offer local service to residential customers to try to keep the local Bell companies -- and the benefits of real competition -- out of the long distance market.

The report issued today, called, *Request Denied: Residential Consumers Refused Local Telephone Service by Competitive Phone Companies*, is a preliminary look at local competition in three Southeastern cities -- Orlando, Florida; Spartanburg/Greenville, South Carolina; and New Orleans, Louisiana. A national report is due out later this fall.

The report showed the following regional trends:

- AT&T, MCI and Sprint refused requests for local residential service in all three cities.
- Seven small competitive local service providers operating in the three cities refused requests from residential customers for local telephone service.
- Most small competitors had no plans to provide residential service.
- AT&T, MCI and Sprint all offer local service to businesses in one or more of the three cities.

"These trends indicate trouble for consumers down the road," said Ledford. "If long distance companies are allowed to serve only the most profitable markets, many people, neighborhoods, and even entire communities could be left out of the information age. And if the long distance companies get their way, consumers will also be denied the benefits of Bell company entry into long distance. More must be done to stimulate competition in the residential market and to make sure all consumers benefit."

Keep America Connected, a coalition of 47 organizations representing consumers, labor, and local phone companies, collaborated with local citizen groups and BellSouth to produce the report. A look at 10 other cities around the country will be out later this fall.

For a copy of the report call 202-842-4080.

Request Denied

Residential Consumers Refused
Service by Competitive Local
Telephone Companies

A Preliminary Report from

Keep America Connected

A National Campaign for Affordable Telecommunications

October 17, 1997

Request Denied

Residential Consumers Refused Service by Competitive Local Telephone Companies

Executive Summary

Consumers are still waiting to see the benefits of the 1996 Telecommunications Act. The big three -- AT&T, MCI and Sprint -- continue to dominate the long distance market and residential consumers have no options for an alternative local provider. Policy makers are asking "why?" The Act brought with it the promise of a new era of competition in telecommunications. The pro-competitive environment was supposed to bring more consumer choices, lower rates, better service and economic growth. However, the anticipated competition and the resulting benefits for consumers are far from reality.

Keep America Connected¹ sought to find out whether the big three long distance companies and smaller competitive local exchange carriers (CLECs) are offering local service to residential consumers. If so, where? If not, why not? We set out to answer these questions the easy way -- we asked them.

Summary of Findings

Local residents of New Orleans, Louisiana, Orlando, Florida and Spartanburg/Greenville, South Carolina, called local sales representatives to request local service. Here is what they were told:

- AT&T, MCI and Sprint refused requests for local residential service in all three cities.
- AT&T offers local service to large businesses in all three cities. MCI and Sprint both offer local service to businesses in Orlando, and Sprint serves businesses in New Orleans.
- Seven small, competitive local service providers operating in the three cities refused requests from residential customers for local telephone service.

¹ Keep America Connected is a coalition of organizations representing older Americans, people with disabilities, rural and inner city residents, people of color, lower income citizens, labor and telecommunications providers. The goal of the Keep America Connected Campaign is to ensure that all consumers, not just big business and upper end consumers, have affordable access to the modern telecommunications infrastructure and services.